

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
V.)	CRIMINAL NO. SA-20-CR-454-OLG
)	
DONALD TREVINO (1),)	
RODOLFO VILLALOBOS (2),)	
DAVID BOTELLO (3),)	
JOSEPH LLOYD VONALLMAN (4),)	
DAVID CORTEZ JR. (5),)	
MOSES CHAVEZ (6),)	
NICHOLAS NEAVES (7),)	
RICHARD AGUEROS III (8),)	
LUZ DEL CARMEN)	
VELARDE-CAMPOS (10),)	
AARON MUNIZ (11),)	
ISABEL HERNANDEZ-GARCIA (12),)	
)	
Defendants.)	

**UNITED STATES OF AMERICA'S
BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY**

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas and the undersigned Assistant United States Attorney, and files the following Bill of Particulars for Forfeiture of Property.

The First Superseding Indictment (Doc. 184) returned on April 21, 2021, gave notice that the United States seeks the criminal forfeiture of property from the Defendants indicted in the instant case pursuant to Title 21 U.S.C. § 853 (a)(1) and (2) for violations of Title 21 U.S.C. §§ 846, 841(a)(1), (b)(1)(A), (b)(1)(B), and (b)(1)(C) and pursuant to Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c) for violations of 18 U.S.C. §§ 922(g)(1) and 924(c)(1)(A).

Specifically, this Bill of Particulars seeks the criminal forfeiture of the properties listed herein.

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE

[See Fed. R. Crim. P. 32.2]

I.

Drug Violations and Forfeiture Statutes

[Title 21 U.S.C. §§ 846, 841(a)(1), (b)(1)(A), (b)(1)(B), and (b)(1)(C) subject to forfeiture pursuant to Title 21 U.S.C. § 853(a)(1) and (2)]

As a result of the criminal violations set forth in Counts One through Six, Eight, and Eleven, the United States of America gives notice to the Defendants of its intent to seek the forfeiture of the property described below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 21 U.S.C. § 853(a)(1) and (2), which states:

Title 21 U.S.C. § 853. Criminal forfeitures

(a) Property subject to criminal forfeitures.

Any person convicted of a violation of this subchapter or subchapter II punishable by imprisonment for more than one year shall forfeit to the United States, irrespective of any provision of State law.--

(1) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation;

(2) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation; . . .

II.

Firearm Violations and Forfeiture Statutes

[Title 18 U.S.C. §§ 922(g)(1) and 924(c)(1)(A), subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]

As a result of the criminal violations set forth in Counts Seven, Nine, Ten, Twelve and Thirteen, the United States of America gives notice to the Defendants of its intent to seek the forfeiture of the property described below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. §

2461(c), which states:

Title 18 U.S.C. § 924. Penalties

(d)(I) Any firearm or ammunition involved in or used in any knowing violation of subsection . . . (g) . . . of section 922 . . . or knowing violation of section 924 . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter. . . .

This Notice of Demand for Forfeiture includes, but is not limited to, the following property:

Currency

1. \$6,380.00, more or less in United States Currency;
2. \$5,977.00, more or less in United States Currency;
3. \$873.00, more or less in United States Currency;
4. \$29,340.50, more or less in United States Currency;
5. \$10,657.00, more or less in United States Currency; and
6. \$2,150.00, more or less in United States Currency;

Firearms

1. Smith & Wesson, model SW40VE, semi-automatic pistol, .40 S&W in caliber;
2. Ruger, model SR9, semi-automatic pistol, 9mm in caliber;
3. Glock 22, .40 caliber semi-automatic handgun; serial # BKTG770;
4. Glock 27, .40 caliber semi-automatic handgun; serial # BPKE0950;
5. Sig Sauer semi-automatic handgun; serial # G293091;
6. Taurus G3c, 9mm caliber semi-automatic handgun; serial # ABG70733;
7. IWI UZI 9mm caliber semi-automatic pistol; serial # U0000082;
8. Century Arms Mini Draco, 7.62mm caliber semi-automatic pistol; serial #PE-9846-2019-RO;
9. Century Arms Mini Draco, 7.62mm caliber semi-automatic pistol; serial #PMD-12913-198-RO;
10. Glock 17, 9mm caliber semi-automatic handgun; serial # BPGV324;
11. Smith & Wesson .40 caliber semi-automatic handgun;
12. High Point 9mm semi-automatic handgun; serial # P1699869;
13. Springfield Armory .45 caliber semi-automatic handgun; serial # MG644575;
14. Kimber 9mm semi-automatic handgun; serial # S1160491;
15. Smith & Wesson .40 caliber semi-automatic handgun; serial # FWM6701;
16. Taurus pistol, 38 caliber; serial # LR80542; and
17. Any and all firearms, ammunition, and/or firearm accessories involved in or used in the commission of the criminal offense(s).

Respectfully submitted,

ASHLEY C. HOFF
UNITED STATES ATTORNEY

By: /s/
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Attorneys for the United States of America

CERTIFICATE OF SERVICE

I hereby certify that on May 11, 2021, the foregoing instrument was electronically filed with the Clerk of the Court using the CM/ECF System which will transmit notification of such filing to the following CM/ECF participants:

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/s/

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